

# MAZZOLA LINDSTROM<sub>LLP</sub>

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September 23, 2021

**Via ECF**

Hon. Ronnie Abrams, USDJ  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Rule 6 Request (on Consent) for  
Enlargement of Time to Serve  
Amended Complaint**

**Re: Cathy Areu v. Fox News Network, LLC, Ed Henry, Sean Hannity, Tucker  
Carlson, and Howard Kurtz, SDNY Docket No. 20-cv-8678 (RA) (GWG)**

Dear Judge Abrams:

On September 20th, this law firm was substituted in as counsel for plaintiff Cathy Areu. (DE60). Pursuant to Your Honor's opinion and order of September 9th (DE 54), Ms. Areu has until September 30th "if she so chooses" to submit an amended complaint. This law firm is now conducting a *de novo* review of the matter, and we therefore request a brief extension of two weeks – until October 14, 2021 – to submit an amended complaint, if Ms. Areu elects to proceed with this lawsuit.

Counsel for all of the defendants have very graciously consented to this request. Accordingly, plaintiff Areu most respectfully requests that the court "so order" this Rule 6 request for an extension of time.

We thank the court for its consideration of this request.

Respectfully submitted,

Mazzola Lindstrom LLP



Richard E. Lerner

cc: All Counsel via ECF